

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**MANIKANTA PASULA, LIKHITH  
BABU GORRELA, THANUJ KUMAR  
GUMMADAVELLI, HANGRUI ZHANG,  
and HAOYANG AN, on behalf of  
themselves and all those similarly situated,  
Plaintiffs,**

**v.**

**U.S. DEPARTMENT OF HOMELAND  
SECURITY;**

**U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT;**

**U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT, BOSTON FIELD  
OFFICE;**

**U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT, MANCHESTER SUB-  
FIELD OFFICE;**

**KRISTI NOEM, Secretary of the  
Department of Homeland Security;**

**TODD LYONS, Acting Director of the  
Immigration and Customs Enforcement;**

**Defendants.**

**No. 1:25-cv-156-SE-TSM**

**THE PARTIES' JOINT STIPULATION REGARDING  
THE BRIEFING SCHEDULE ON PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION (ECF NO. 4)**

The parties hereby submit this Joint Stipulation Regarding the Briefing Schedule on Plaintiffs' Motion for Class Certification (ECF No. 4). The parties have agreed to the following briefing schedule:

- Defendants' Objection: **Friday, May 30, 2025**

- Plaintiffs' Reply: **Friday, June 13, 2025**

Plaintiffs and similarly situated members,

By and through their Counsel,

Respectfully submitted,

Dated: May 8, 2025

Ronald L. Abramson (NH Bar:  
83593)  
SHAHEEN & GORDON P.A.  
180 Bridge Street  
Manchester, NH 03104  
603.792.8472  
rabramson@shaheengordon.com

Carol Garvan (NH Bar: 21304)  
Zachary L. Heiden\*  
Heather Zimmerman\*  
AMERICAN CIVIL LIBERTIES UNION OF  
MAINE FOUNDATION  
P.O. Box 7860  
Portland, Maine 04112  
207.619.8687  
cgarvan@aclumaine.org  
heiden@aclumaine.org  
hzimmerman@aclumaine.org

Lynette Labinger\*  
Cooperating counsel,  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF RHODE ISLAND  
128 Dorrance Street, Box 710  
Providence, RI 02903  
401.465.9565  
LL@labingerlaw.com

/s/ Gilles Bissonnette  
Gilles R. Bissonnette (NH Bar: 265393)  
Henry Klementowicz (NH Bar: 21177)  
SangYeob Kim (NH Bar: 266657)  
Chelsea Eddy (NH Bar: 276248)  
AMERICAN CIVIL LIBERTIES UNION OF  
NEW HAMPSHIRE FOUNDATION  
18 Low Avenue  
Concord, NH 03301  
603.227.6678  
gilles@aclu-nh.org  
henry@aclu-nh.org  
sangyeob@aclu-nh.org  
chelsea@aclu-nh.org

Fermín L. Arraiza-Navas\*  
#215705 (US District Court Puerto Rico)  
AMERICAN CIVIL LIBERTIES UNION  
PUERTO RICO CHAPTER  
Union Plaza, Suite 1105  
416 Avenida Ponce de  
León  
San Juan, Puerto Rico 00918  
787.753.9493  
farraiza@aclu.org

*Counsel for Plaintiffs*  
*\* Admitted pro hac vice*

Dated: May 8, 2025

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General

DREW ENSIGN  
Deputy Assistant Attorney General

By: /s/ Glenn M. Girdharry  
GLENN M. GIRDHARRY  
Assistant Director  
United States Department of Justice  
Civil Division  
Office of Immigration Litigation  
General Litigation and Appeals  
P.O. Box 868, Ben Franklin Station  
Washington, DC 20044  
Tel: (202) 532-4807 Email:  
[glenn.girdharry@usdoj.gov](mailto:glenn.girdharry@usdoj.gov)

ALESSANDRA FASO  
ALEXANDRA MCTAGUE SCHULTE  
Senior Litigation Counsels